

1000 703 5715 2752

August 27, 2003

Mr. Robert Moore
 Office of Nutritional Products, Labeling &
 Dietary Supplements, HFS 811
 Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740

SEP 15 2003

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Probiotic Pearls™	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidobacterium longum	Poor nutrition, high sugar consumption and the use of antibiotics can all affect your intestinal balance.* When this internal balance is off your digestion is poor, resulting in fatigue and lack of energy.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

 By: Robert Doster
 Robert Doster

Title: Senior Vice President of Scientific Affairs

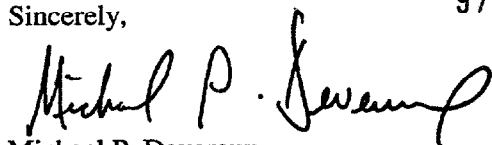
 Date: 8/27/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

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LET



Michael P. Devereux
 Chief Financial Officer

Probiotic Pearls 18p

13/29

85911

825 CHALLENGER DRIVE
 GREEN BAY, WI 54311-8328
 920-469-9099
 TOLL FREE 800-553-2370
 FAX 920-469-4418
 FAX TOLL FREE 888-311-5657
 WWW.PHYTOPHARMICA.COM



August 28, 2003

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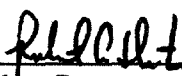
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Probiotic Pearls™	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidbacterium longum	Step up to Probiotic Pearls™ and increase healthy intestinal flora.*

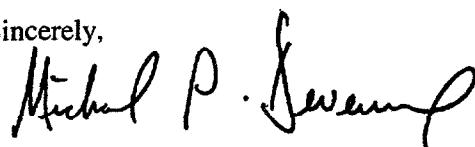
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By: 
Robert Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/28/03

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Sincerely,


Michael P. Devereux
Chief Financial Officer

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